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May 1, 2025

VIA ECF

Honorable Cheryl L. Pollak, U.S.M.J.
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

**Re: Nuro Feratovic v. Neptune Maintenance Corp. et al
Case No.: 1:24-cv-04186**

Dear Judge Pollak:

This firm represents Defendants, Neptune Maintenance Corp., Albert Doe, and Khalil Doe (collectively “Defendants”) in the above-referenced action.

Defendants write to request a one-week extension for their time to submit their opposition to Plaintiff’s Motion to Amend the Complaint from May 2, 2025 to May 9, 2025, or such other date as the Court orders. This is the first request for an extension of time regarding Plaintiff’s Motion to Amend the Complaint (the “Motion”). This adjournment is necessary to provide Defendants additional time to investigate Plaintiff’s newly added claim, conduct research, and determine whether Defendants will be opposing the Motion.

Plaintiff consents to Defendants’ adjournment request. This adjournment would affect Plaintiff’s time to submit its reply to Defendants’ opposition from May 9, 2025 to May 16, 2025 or such other date as the Court orders.

We thank the Court for its attention to this matter.

Respectfully submitted,

Joseph M Labuda

Joseph M. Labuda Esq.

cc: Counsel of Record